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November 3, 2005

VIA FEDERAL EXPRESS

The Honorable Charles L.A. Terreni Chief Clerk South Carolina Public Service Commission 101 Executive Center Drive Columbia, SC 29210

Re: In the Matter of the Application of Comcast Phone of South Carolina, Inc., For

an Amended Certificate of Public Convenience and Necessity to Provide Local Exchange and Interexchange Telecommunications Services, For Flexible Rate Structure for Local Exchange Service Offerings First Approved in Docket No. 97-467-C, and For Alternative Regulation First Approved in Docket No. 95-661-C

Docket No.: 2005-303-C

Dear Mr. Terreni:

Enclosed please find the original and 25 copies the "Direct Testimony of David Sered" to be filed in the above referenced docket.

Should you have any questions, please contact me on (704) 331-4926.

Very truly yours,

WOMBLE CARLYLE SANDRIDGE & RICE,

a Professional Limited Liability Company

Lori Reese Patton

LRP/sfh Enclosures

cc:

Valerie Yates David Sered

OF THE STATE OF SOUTH CAROLINA DOCKET NO. 2005-303-C

In the Matter of the Application of Comcast Phone of South Carolina, Inc., For An Amended Certificate of Public Convenience and Necessity to Provide Local Exchange and Interexchange Telecommunications Services, For Flexible Rate Structure for Local Exchange Service Offerings First Approved in Docket No. 97-467-C, and For Alternative Regulation First Approved in Docket No. 95-661-C

Docket No. 2005-303-C

DIRECT TESTIMONY OF DAVID SERED

I, David Sered, do hereby testify as follows in support of the Application of Comcast Phone of South Carolina, Inc. ("Comcast Phone") for an Amended Certificate of Public Convenience and Necessity to Provide Local Exchange and Interexchange Telecommunications Services in Verizon and Sprint service areas within the State of South Carolina.

Q: PLEASE STATE YOUR FULL NAME, BUSINESS ADDRESS AND POSITION.

A: My name is David Sered. I am the Director of Regulatory/Government Affairs for the Southern Division of Comcast Cable Communications. LLC. My business address is 600 Galleria Parkway, Suite 1100, Atlanta, Georgia 30339. My business telephone number is (678) 460-1610, and my facsimile number is (678) 385-5101.

Q: PLEASE BRIEFLY DESCRIBE YOUR RESPONSIBILITIES FOR THE APPLICANT.

A: In my capacity as Director of Regulatory/Government Affairs, I coordinate and ensure consistency among field personnel supporting the Comcast's telecom regulatory compliance and implementation activities; and respond to data requests and interrogatories propounded by federal and state regulatory agencies.

In addition, I am responsible for the development, implementation and coordination of Southeastern state legislative government and regulatory programs and practices including monitoring legislation, developing legislative and regulatory strategies, coordination with state association management, key contact programs, training, and compliance as well as the develop and maintain relationships with government representatives at state level.

- Q: PLEASE DESCRIBE YOUR BUSINESS EXPERIENCE AND EDUCATIONAL BACKGROUND.
- A: I was named to my current position of Director of Regulatory/Government Affairs in March 2003. Prior to joining Comcast I served in a variety of regulatory and legal positions in the telecommunications industry working for KMC Telecom, MCI and Sprint. I received a B.A. from the University of Illinois at Chicago in 1989 and a Juris Doctorate from John Marshall Law School in Atlanta, Georgia.
- Q: ARE ALL STATEMENTS IN COMCAST PHONE'S APPLICATION TRUE, TO THE BEST OF YOUR KNOWLEDGE, INFORMATION AND BELIEF?
- A. Yes.
- Q: PLEASE DESCRIBE THE CURRENT CORPORATE STRUCTURE OF COMCAST PHONE.
- A: Comcast Phone is a direct, wholly owned subsidiary of Comcast Phone II, Inc., and an indirect, wholly owned subsidiary of Comcast Corporation. An organizational chart showing Comcast Phone and its direct and indirect corporate parents is attached as Exhibit A.
- Q: DOES COMCAST PHONE POSSESS THE REQUISITE FINANCIAL, MANAGERIAL AND TECHNICAL ABILITIES TO PROVIDE THE SERVICES FOR WHICH IT HAS APPLIED FOR AUTHORITY?
- A: Yes.
- Q: PLEASE DESCRIBE COMCAST PHONE'S FINANCIAL QUALIFICATIONS.

As I previously stated, Comcast Phone is an indirect, wholly owned subsidiary of Comcast Corporation. As such, Comcast Phone necessarily will rely on the financial resources of its corporate parent to fund its initial telecommunications operations within the State of South Carolina, and accordingly, to provide services requested by this Application. A copy of Comcast Corporation's most recent 10-K filing with the Securities and Exchange Commission can be downloaded from its investor relations website using the following address: http://www.cmcsk.com.

Q: PLEASE DESCRIBE COMCAST PHONE'S MANAGERIAL AND TECHNICAL QUALIFICATIONS.

A: Comcast Phone has superior technical and managerial qualifications to develop and maintain successful operations within the State of South Carolina, and to ensure the continued provision of quality services to South Carolina consumers. Members of Comcast Phone's senior management team have significant experience in the critical functions of communications network operations, OSS/BSS, product development, sales and marketing, business management and finance. These individuals have acquired superior expertise by their work in various segments of the communications industry prior to assuming their current managerial roles at Comcast Phone, and are highly qualified to manage the operations of Comcast Phone within the State of South Carolina.

O: WHAT SERVICES WILL COMCAST PHONE OFFER?

A: Comcast Phone seeks to provide competitive local exchange service within those portions of the state served by Verizon and Sprint and interexchange service on a statewide basis. Initially, Comcast Phone intends to provide only exchange access within the Verizon and Sprint territories. Comcast Phone may expand its offerings to provide a full suite of voice and other services to business and residential customers within South Carolina. We plan to commence operations within the Verizon and Sprint territories following the PSC's grant of the Certificate requested by this application and execution of an interconnection agreement between Comcast Phone and each ILEC, Verizon and Sprint.

Q: WILL THE GRANTING OF A CERTIFICATE OF CONVENIENCE AND NECESSITY TO COMCAST PHONE SERVE THE PUBLIC INTEREST?

A: Yes. The Commission's grant of the Certificate requested by Comcast Phone's Application for Amended Certificate would serve the public interest because Comcast Phone is technically, managerially and financially qualified to provide quality services to consumers within the State of South Carolina. Moreover, Comcast Phone's provision of the services for which authority is requested by its Application would expand the service options currently available in South Carolina, and would increase competition in the markets for those services by expanding the diversity of service providers.

The participation of Comcast Phone within the State of South Carolina would promote consumer choice by expanding the availability of innovative, high-quality, reliable and competitively priced services. The Commission's grant to Comcast Phone of the Certificate requested by its Application likely would compel other service providers within the State of South Carolina to improve their existing services, to increase the quality and efficiency of their operations, and to introduce innovative new services of their own. Moreover, the addition of Comcast Phone to South Carolina would make it

more probable that South Carolina consumers will ultimately receive the benefits of downward pressure on prices, improved customer responsiveness and access to increasingly advanced technology.

- Q: DOES COMCAST PHONE INTEND TO COMPLY WITH ALL SOUTH CAROLINA PUBLIC SERVICE COMMISSION RULES, STATUTES AND ORDERS PERTAINING TO THE PROVISION OF TELECOMMUNICATIONS SERVICES IN SOUTH CAROLINA, INCLUDING THOSE FOR DISCONNECTION AND RECONNECTION OF SERVICE?
- A: Yes. Comcast Phone intends to comply with all South Carolina Public Service Commission Rules, Statutes and Orders applicable to the telecommunications services that it will provide within South Carolina.
- Q: HAS ANY STATE EVER DENIED COMCAST PHONE OR ONE OF ITS AFFILIATES AUTHORIZATION TO PROVIDE INTRASTATE SERVICE?
- A: No.
- Q: HAS ANY STATE EVER REVOKED THE CERTIFICATION OF COMCAST PHONE, OR ONE OF ITS AFFILIATES?
- A: No.
- Q: WHO IS KNOWLEDGEABLE ABOUT COMCAST PHONE'S OPERATIONS AND WILL SERVICE AS COMCAST PHONE'S REGULATORY AND CUSTOMER SERVICE CONTACT?
- A: Comcast Phone of South Carolina, Inc. has not yet appointed its customer service personnel responsible for the operations of Comcast Phone of South Carolina, Inc within the state of South Carolina. For the present, I will serve as the initial regulatory and customer service contact for Comcast Phone. My contact information is provided on page 1 of this testimony.
- Q: PLEASE EXPLAIN IN DETAIL COMCAST PHONE'S PROPOSED PROCEDURE FOR RESPONDING TO INFORMATION REQUESTS FROM THE SOUTH CAROLINA PUBLIC SERVICE COMMISSION AND ITS STAFF?
- A: As the regulatory and customer service contact for Comcast Phone, I will endeavor to respond to all information requests from the South Carolina Public Service Commission or its Staff. I will contact the appropriate individual within Comcast Phone to obtain the requested information and will promptly provide such information to the requesting South Carolina Public Service Commission party.

Q. DOES THIS CONCLUDE YOUR TESTIMONY?

A: Yes, it does.

STATE OF NORTH CAROLINA)

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VERIFICATION

COUNTY OF MECKLENBURG)

David Sered, being first duly sworn, deposes and says that he is the Director of Regulatory/Government Affairs for the Southern Division of Comcast Cable Communications, LLC and authorized to execute this Verification on behalf of Comcast Phone of South Carolina, Inc. and that he has read the foregoing and that the facts contained therein are true and correct to the best of his knowledge, information and belief.

DATED this 2 day of November, 2005.

David Sere

Director of Government and Regulatory Affairs

Comcast Cable Communications, LLC

Sworn to and subscribed before me this 2 day of November, 2005, and notarized on said date.

(Notary Public)

My Commission Expires:

Notary Public
Cobb County, GEORGIA
My Commission Expires June 21, 2009

[NOTARIAL SEAL]

OF THE STATE OF SOUTH CAROLINA DOCKET NO. 2005-303-C

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I certify that copies of the Prefiled Testimony in the above referenced matter were served on the _____ day of November, 2005, by placing same in the United States mail, first-class postage prepaid, addressed as follows:

Jeff Nelson, Esq.
Office of Regulatory Staff
State of South Carolina
PO Box 11263
Columbia, S.C. 29211

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